



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

DEC 02 2010

**Warning Letter and Return to Compliance**

Diana Crane  
Vice President of Quality  
Associated Plating Co.  
9636 Ann Street  
Santa Fe Springs, CA 90670  
EPA Identification Number: CAD 043 079 110

Dear Ms. Crane,

On October 26, 2010 a hazardous waste compliance inspection was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) and the Santa Fe Springs Fire Department at Associated Plating Company (APC). During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. 6927(a).

A copy of the inspection report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and a potential violation of the State of California authorized program under RCRA Subtitle C. APC's response during and subsequent to the inspection adequately addressed the potential violations which were noted during the inspection, and documents APC's return to compliance with the regulations cited in the report. Any omissions in the report shall not be construed as a determination of compliance with any other applicable regulation.

By copy of this letter, EPA is providing the State of California with notice that it intends to take no further enforcement action for the violations noted.

The EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As

described in 40 C.F.R § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within 14 calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

This letter should not be construed as a determination by the EPA of your compliance with any other applicable regulations. APC should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal, State and local environmental requirements. If you have questions related to the inspection report or this letter, please contact Jennifer Downey of my staff at (415) 972-3342 or at [downey.jennifer@epa.gov](mailto:downey.jennifer@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy C. Miller', with a stylized flourish at the end.

Amy C. Miller, Manager  
RCRA Enforcement Office

Enclosure:

cc (w/out enclosure): Richard Kallman ([richardkallman@santafesprings.org](mailto:richardkallman@santafesprings.org))  
Chuck McLaughlin, DTSC ([cmclaughlin@dtsc.ca.gov](mailto:cmclaughlin@dtsc.ca.gov))



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION  
RCRA ENFORCEMENT OFFICE

**Purpose:** RCRA Compliance Evaluation Inspection

**Facility:** Associated Plating Co.

**Location:** 9636 Ann St.  
Santa Fe Springs, CA 90670

**EPA ID Number:** CAD 043 079 110

**Date of Investigation:** October 26, 2010

**EPA Representatives:** Jennifer Downey  
Enforcement Officer  
(415) 972-3342  
downey.jennifer@epa.gov

Jim Polek  
Enforcement Officer  
(415) 972-3185  
polek.jim@epa.gov

**Santa Fe Springs  
Fire Department:** Richard Kallman  
Environmental Protection Specialist  
(562) 906-3810  
richardkallman@santafesprings.org

**Facility Representative:** Diana Crane  
Vice President of Quality  
(562) 946-5525  
d.crane@associatedplating.com

**Report Prepared By:** Jennifer Downey

**Report Date:** November 22, 2010

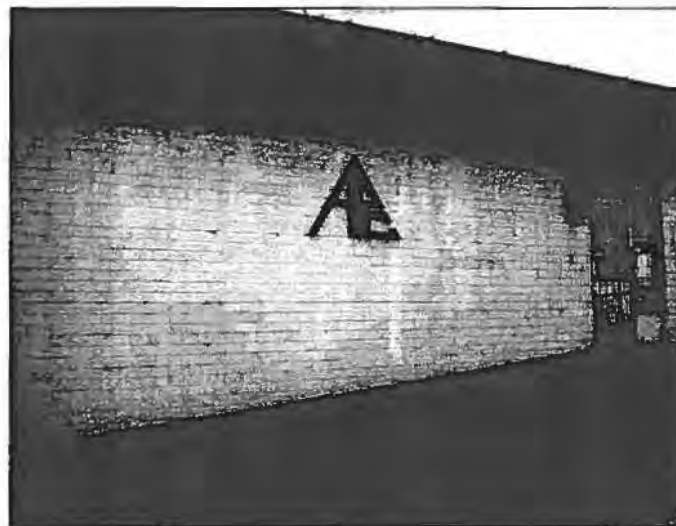
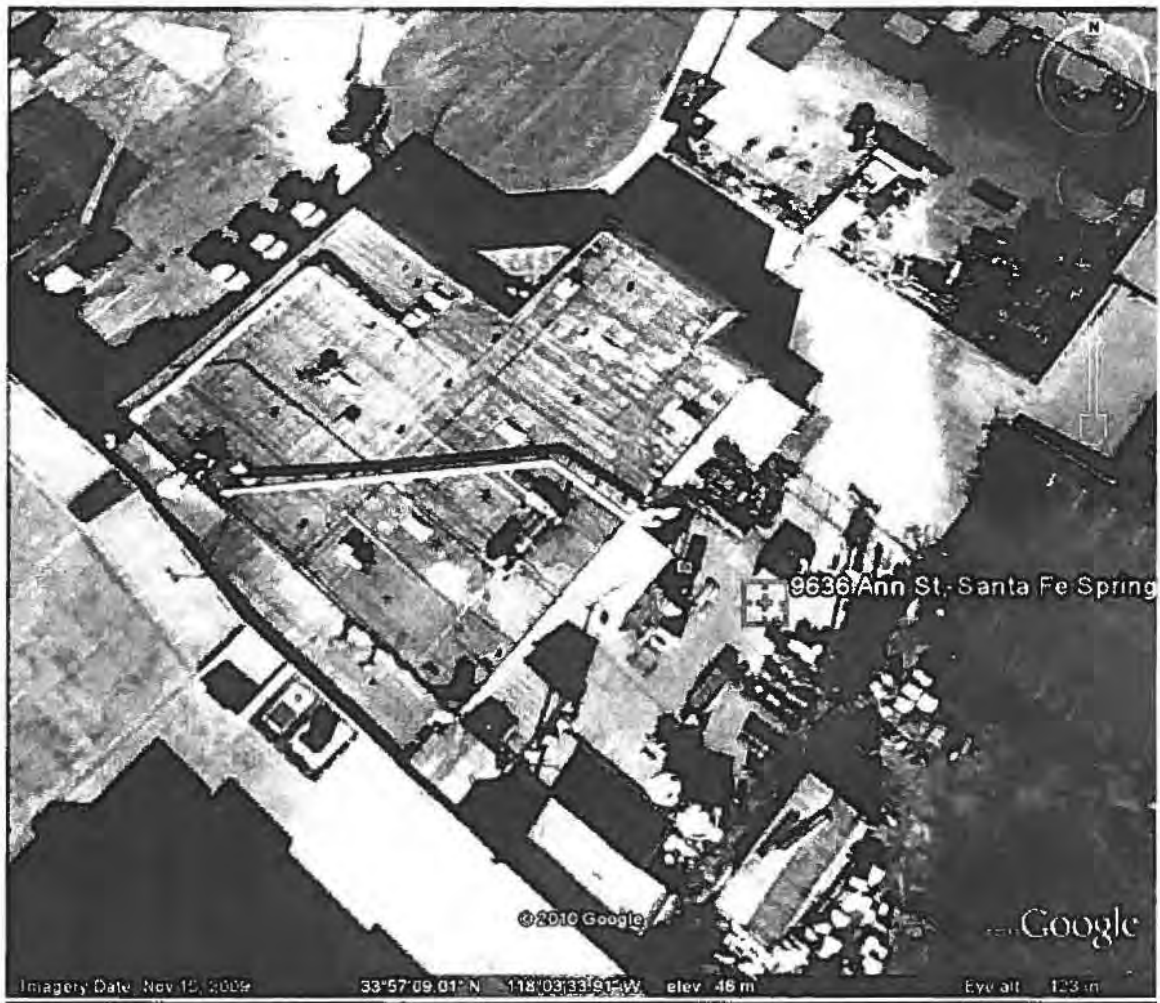
## Introduction:

On October 26, 2010, representatives of the U.S. Environmental Protection Agency (EPA) and Santa Fe Springs Fire Department conducted an unannounced compliance evaluation inspection (CEI) of Associated Plating Co. (herein "APC" or "the facility"). The purpose of the inspection was to determine APC's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279, and the California Code Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20.

The inspectors conducted a physical inspection of the facility and reviewed records related to SRE's hazardous waste management practices. This inspection report summarizes the events that transpired during the inspection and observations made by the inspectors.

## Facility Background:

	Associated Plating Co.
	<a href="http://www.associatedplating.com">www.associatedplating.com</a>
	APC is located at 9636 Ann Street in Santa Fe Springs, CA, and has been in operation at its current location since the mid 1970s
	36
	6:00 – 2:30 Monday thru Friday
	August 15, 1980
	APC is a metal finishing company offering plating services for various customers primarily in the aerospace, military, electronics, and medical industries. The Facility specializes in nickel metal plating, but also performs plating operations with copper, tin, tin-lead alloys, zinc-nickel, gold and silver. APC does not do any cadmium or chromium plating.
	Rinse water from electroplating operations containing traces of metals, wastewater treatment sludge from plating operations, spent stripping solutions containing copper and nickel, spent gold filters from plating operations, spent silver and gold stripping and plating solutions containing cyanide, waste paint material, used oil, and universal waste lamps
	Listed in RCRAInfo as a large quantity generator (LQG) for both RCRA and non-RCRA California-only hazardous waste
	APC was last inspected by the Santa Fe Springs Fire Department on February 3, 2010. Potential violations identified included storage of hazardous waste for more than 90 days and tiered permitting violations (CA-only violations). A prior EPA inspection in November 2003 turned up multiple violations resulting in EPA taking formal enforcement action against APC. A compliance order/final agreement (CA/FO) between EPA and APC was signed in September 2005 as part of which APC paid a \$16,500 penalty.



Entrance to Associated Plating Co.

### **Facility Inspection:**

The inspectors were given a tour of the facility by Ms. Diana Crane. The following areas were inspected:

1. Storage Yard Area
2. Wastewater Treatment Area
3. Maintenance & Machine Shop
4. Plating Lines
5. Chemistry Laboratory

#### **1. Storage Yard Area:**

The inspectors evaluated the 90-day storage area which is located in an enclosed yard South-East of the building (see photograph to the right). At the time of the inspection only 3 containers of hazardous waste were being stored in the area: 1.) supersack of metal hydroxide sludge (F006) dated 8/25/10; 2.) 55-gallon drum of metal filters contaminated with cyanide (F008) dated 9/7/10; and 3.) supersack of non-RCRA hazardous waste nickel filters (CA 181) dated 9/2/10. All containers were closed and properly labeled with the required information.



Product/chemicals are also stored in the yard in segregated bermed areas and bays so that in case of an accidental release incompatible chemicals won't come into contact. Adjacent to the 90-Day Storage Area is a covered, bermed area which houses the first phase (pH adjustment) of the cyanide destruction system and is where some metal stripping operations take place.

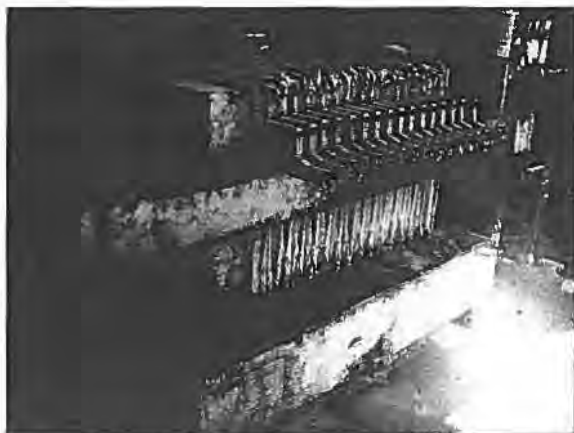
The inspectors observed an eyewash and fire extinguisher in the storage yard area. There is also an alarm system and employees with hazardous waste duties carry cell phones. No potential violations were observed in the storage yard area.

#### **2. Wastewater Treatment Area**

Aqueous waste streams generated at APC are treated onsite using batch treatment methods including cyanide destruct, neutralization, metals precipitation, flocculation and sludge dewatering using a filter press (see photograph at the top of the next page on the left). According to the facility representative the bin of filter cake is emptied at the end of each day and accordingly was marked with the words "emptied daily" and all the required information. Near the filter press was a sludge transfer unit (see photograph



below on the right) where sludge is transferred from the bin into a supersack container. The bin of F006 filter cake on the unit was covered as required and the supersack which was actively being filled with sludge was properly labeled and the accumulation start date of October 1, 2010 was clearly noted. No potential hazardous waste violations were observed in the wastewater treatment area.



Filter press & Filter Cake/Sludge



Sludge Transfer Unit

### 3. Maintenance & Machine Shop

Next the inspectors evaluated the maintenance area and machine shop. In one corner the inspectors observed 5 quart containers of used machine/cutting oil labeled only with the word "used" (see photograph on the right). According to the facility representative the oil had been stored there for approximately 3- 4 months. The containers were not properly labeled, dated or marked with the words "used oil" as required.



At the time of the inspection only new fluorescent lights/lamps were being stored in the maintenance shop area. According to the facility representative, used lamps are routinely thrown in the garbage unboxed. If the lamps break both workers and the environment could potentially be exposed to mercury.

#### **4. Plating Lines**

The inspectors walked through the pretreatment, cleaning and plating line areas (see photograph below on the left). In the pretreatment area the inspectors observed one row of tanks closest to the wall where the floor grating was visibly eroded and material had built up/crystallized on the walkway (see photograph below on the right). The floor grating was also visibly corroded and somewhat wobbly in the precious metals plating line area. The inspectors pointed this out as an area of concern. There was also a small amount of liquid observed in the sumps below the walkway in several areas. According to facility representatives the sumps are pumped out every day and rinsed with hot DI water.



#### **5. Chemistry Laboratory**

APC has a small analytical laboratory in which plating solutions are analyzed on a weekly basis. Solutions are returned to the baths once the analysis has been completed. No hazardous waste was observed in the chemistry lab at the time of the inspection.

#### **Record Review:**

The inspectors reviewed APC's weekly inspection logs, contingency plan, training records, hazardous waste manifests and land disposal restrictions from the past 3 years, and their 2009 biennial report. The inspectors noted that contingency plan needed to be updated with the current emergency coordinator contact information and that it did not include information on the location of APC's emergency equipment.

#### **Post Inspection:**

On November 5, 2010 APC sent EPA a letter and supporting documents illustrating that the potential violations noted during the October 26, 2010 inspection had been corrected.



**POTENTIAL VIOLATIONS**  
**of**  
**California Title 22 CCR and RCRA 40 CFR**  
**Hazardous Waste Management Regulations**

**1. Failure to Properly Manage Universal Waste**

A universal waste handler must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. 22 CCR § 66273.33(b) [40 CFR § 273.13(d)]

Finding 1: At the time of the inspection APC was throwing used fluorescent lamps into the trash unboxed.

Facility  
Response: After the inspection APC drafted and submitted a Universal Waste Management Plan and verified that personnel who manage universal waste are aware of the requirements detailed in the procedure.

**2. Incomplete Contingency Plan**

The RCRA Contingency Plan must list names, addresses, and phone numbers of all persons qualified to act as emergency coordinator and this list must be kept up to date. In addition, the RCRA Contingency Plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment) and the location and a physical description of each item on the list, and a brief outline of its capabilities. 22 CCR § 66262.34(a)(4); 22 CCR § 66265.52 [40 CFR § 262.34(a)(4); 40 CFR § 265.52]

Finding 1: The inspectors noted that APC's emergency coordinator information needed to be updated and that the contingency plan didn't specify the location of their emergency equipment.

Facility  
Response: APC submitted a revised contingency plan that contained all the required elements.

**POTENTIAL VIOLATIONS  
of  
California Only Title 22 CCR  
Hazardous Waste Management Requirements**

**1. Failure to Properly Manage Used Oil**

Containers accumulating used oil must be labeled with the name and address of the generator and the words "Used Oil," "Hazardous Waste". In addition the container must be labeled with the initial date of accumulation. 22 CCR § 66262.34(f); 22 CCR §66279.21

Finding 1: The inspectors observed 5 quart containers of used cutting oil in the machine shop that were not labeled as required.

Facility  
Response: During the outbriefing APC committed to ensuring that used oil containers are labeled and dated as required. APC's November 5, 2010 letter stated that the used oil containers identified during the inspection were subsequently sent to a local Pep Boys for recycling.

### LIST OF ATTACHMENTS

Attachment 1: Inspection Photo Log

Attachment 2: APC's November 5, 2010 Inspection Follow-up Letter

**Photograph Log for EPA's Associated Plating Co.  
RCRA Inspection October 26, 2010**

*All photographs on this log were taken with a digital camera by Jim Polek, RCRA Enforcement Office, EPA Region IX. Please note that each photograph number begins with "PA2600" and that the photo log starts with photo number 46 since the camera's memory card contained photos from previous unrelated inspections.*

46. Picture of entrance to Associated Plating Co.
47. Hazardous waste label on supersack of metal hydroxide sludge
48. 55-gallon drum of metal filters from plating operations
49. Overview shot of 90-day hazardous waste storage area
50. Supersack of non-RCRA hazardous waste nickel filters
51. 1<sup>st</sup> phase of cyanide destruction system
52. Metal stripping area
53. Wastewater treatment system filter press
54. Hazardous waste label on bin of filter cake under the filter press
55. Sludge transfer unit
56. Hazardous waste label on supersack of filter cake under the sludge transfer unit
57. Machine/cutting oil in bucket (in use/product)
58. 5 quart containers of used oil in machine shop area
59. Metal plating line
60. Overview shot of plating operations
61. Corroded metal grating and material build up/crystallization on walkway between tanks in plating area



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November 5, 2010

Ms. Jennifer Downey  
US EPA Region 9  
75 Hawthorne Street (WST-3)  
San Francisco, CA 94105

Dear Ms. Downey,

This letter is in response to the site inspection conducted at Associated Plating Company, 9636 Ann Street, Santa Fe Springs, CA 90670 on October 26, 2010.

As requested, the Contingency Plan has been updated, a Universal Waste Management Plan has been written, five quarts of used shop oil has been recycled off-site, and a copy of the profile for debris has been obtained.

The five quarts of used shop oil were disposed of at the Pep Boys facility located at 11456 E. Washington Blvd., Whittier, CA 90606. Associated Plating Company's Maintenance Manager signed Pep Boy's log to record acceptance of the material.

The profile for the filters and debris has been obtained from Island Environmental. The major portion of the debris is nickel-containing. The level of lead has been tested is less than 100 ppm.

A non-controlled copy of Associated Plating Company's Universal Waste Management plan is included. Personnel who manage universal wastes generated at Associated Plating Company are aware of the requirements detailed in the procedure.

Please let me know if you need any additional information or if you have any questions.

Regards,

Diana Crane  
V.P. of Quality  
Associated Plating Company

cc: R. Kallman, SFS Fire Department